

Message

---

**From:** Walker, Dana [Walker.Dana@epa.gov]  
**Sent:** 7/29/2015 3:09:12 PM  
**To:** Kwedza, John [jkwedza@pa.gov]  
**CC:** Patel, Jay (DEP) [jaypatel@pa.gov]; Gaul, Andrew [agaul@pa.gov]; Trulear, Brian [Trulear.Brian@epa.gov]; Cruz, Francisco [Cruz.Francisco@epa.gov]; Hennie, Jasmine [Holmes.Jasmine@epa.gov]  
**Subject:** Hanover Foods Draft Permit (PA0044741)

Pascal,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

**Hanover Foods**

**NPDES Number: PA0044741**

**EPA Received: June 30, 2015**

This is a minor permit that discharges to Oil Creek, and is a significant industrial waste discharge to the Chesapeake Bay. Therefore, I have performed a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the Chesapeake Bay Watershed TMDL. I have completed my review and offer the following comment:

1. Part C.II.D.4. of the permit includes the following language:

“Industrial facilities that withdraw water from the same stream or water body to which they discharge, and which have intake monitoring requirements in Part A of this permit, may claim Offsets for background nutrient loads of TN and/or TP if the Cap Loads do not include a deduction for background loads. To utilize the Offsets, the permittee must sample the intake and effluent on the same day, and determine mass loading using the actual flow data for intake and effluent on that day. No Offsets shall be granted for intake nutrients associated with groundwater withdrawals.”

Can you clarify what this language is authorizing in the permit? I understand that the facility's discharge includes a NCCW discharge, but since there are no intake monitoring requirements in Part A of the permit, the intent of this additional language is unclear.

Please address the above and provide me with any changes to the draft permit and/or fact sheet, if necessary.

Thank you,  
Dana

Dana Walker  
NPDES Permits Branch (3WP41)  
Water Protection Division  
US EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029  
Phone: 215.814.2928  
Email: walker.dana@epa.gov